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March 8, 1996

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William F. Caton
Secretary
Federal Communications Commission
1919 M Street, N.W., Room 222
Washington, D.C. 20554

MAR - 8 1996

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

Re: **Notice of Ex Parte Contact by MFS Communications Company, Inc., in CC Docket Nos. 91-141 and 94-97, Phase II**

Dear Mr. Caton:

In accordance with §§ 1.1206(a)(2) of the Commission's Rules, I am filing this letter as notice that, on March 8, 1996, Robert McCausland of MFS Communications Company, Inc., Mark P. Sievers, an attorney with Swidler & Berlin, and I met with Paul D'Ari and Claudia Fox of the Commission's Tariff Division. During the meeting we discussed various issues related to terms and conditions of physical and virtual collocation tariffs. Several handouts were distributed at the meeting, which are appended to this filing.

As required by the Commission's Rules, I am filing an original and one copy of this letter. Please direct any questions concerning this issue to the undersigned.

Respectfully submitted,



Erin M. Reilly

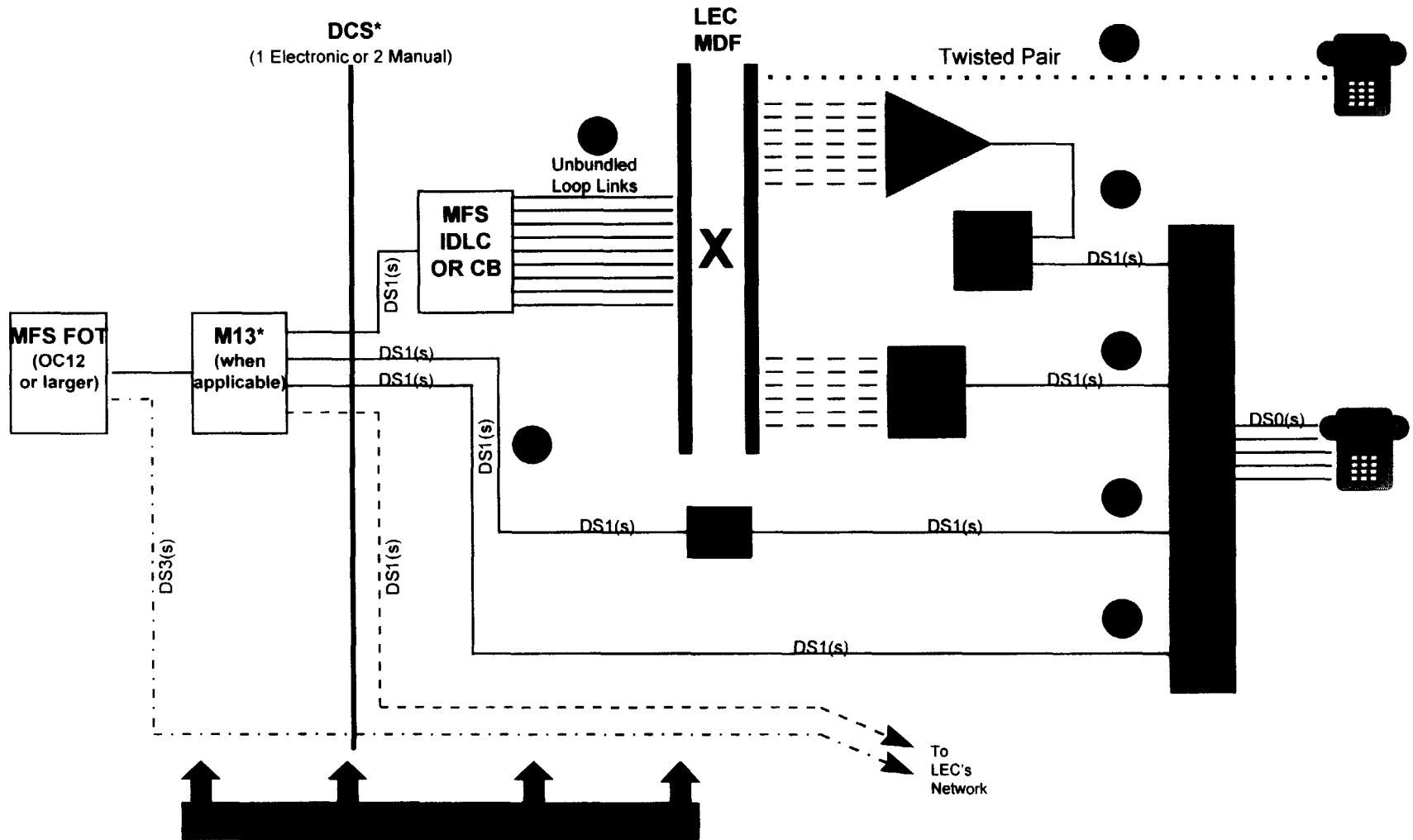
Enclosures

cc: Regina Keeney
James Schlichtling
Richard Welch

Paul D'Ari
Claudia Fox
ITS

EXHIBIT A

ILLUSTRATIVE CO-CARRIER UNBUNDLED LOOP INTERCONNECTION ARRANGEMENTS



*** Two Options (also, see attachments):**

- 1) MFS provides.
- 2) MFS purchases from LEC.

ILLUSTRATIVE CO-CARRIER UNBUNDLED LOOP INTERCONNECTION ARRANGEMENTS

Depiction, from left (MFS' network) to right (incumbent LEC's network):

MFS FOT (Fiber Optic Terminal): MFS' collocated transmission equipment connected to MFS' fiber optic cable; used for special access and switched transport services as well as co-carrier unbundled loop services.

M13 (Multiplexer): MFS may provide this multiplexing through its collocated equipment or may purchase this multiplexing from incumbent LEC's existing tariffs (note that incumbent LEC may provide its tariffed multiplexing service through an electronic DSX instead of a separate multiplexer when MFS purchases that LEC's multiplexing product).

DCS (i.e., DSX - Digital Cross Connect System): This cross connect may be provided by MFS, by incumbent LEC or by both MFS and incumbent LEC, depending on the particular collocation design in the central office. As indicated above, this equipment may be used to provide tariffed multiplexing service.

MFS IDLC (Integrated Digital Loop Carrier) or CB (Channel Bank): MFS supplies and installs this equipment (through the use of incumbent-LEC-approved installation personnel/vendors). Under virtual collocation, incumbent LEC maintains this equipment and provisions circuits to it. Under physical collocation, MFS maintains this equipment and provisions circuits through the use of incumbent LEC's unbundled loop links.

Unbundled Loop Links ● : Incumbent LEC delivers these voice-grade-level links to MFS' collocation equipment area or permits MFS to construct them through the use of authorized personnel/vendors. These may, at the option of MFS, be two-wire or four-wire connections and would provide the same analog and digital (including ISDN) capabilities as incumbent LEC's own loops.

DS1-Level Unbundled Loop Cross Connects ● : MFS may, as an option to the above unbundled loop link approach, purchase from incumbent LEC the unbundled loops through a DS1-level handoff into MFS' collocated M13 or into incumbent LEC's tariffed multiplexing equipment which would connect to MFS' FOT.

LEC MDF (Main Distribution Frame): The cross-connect point for incumbent LEC loops.

Twisted Pair ● : The traditional copper loop facility which remains widely available in collocated central offices.

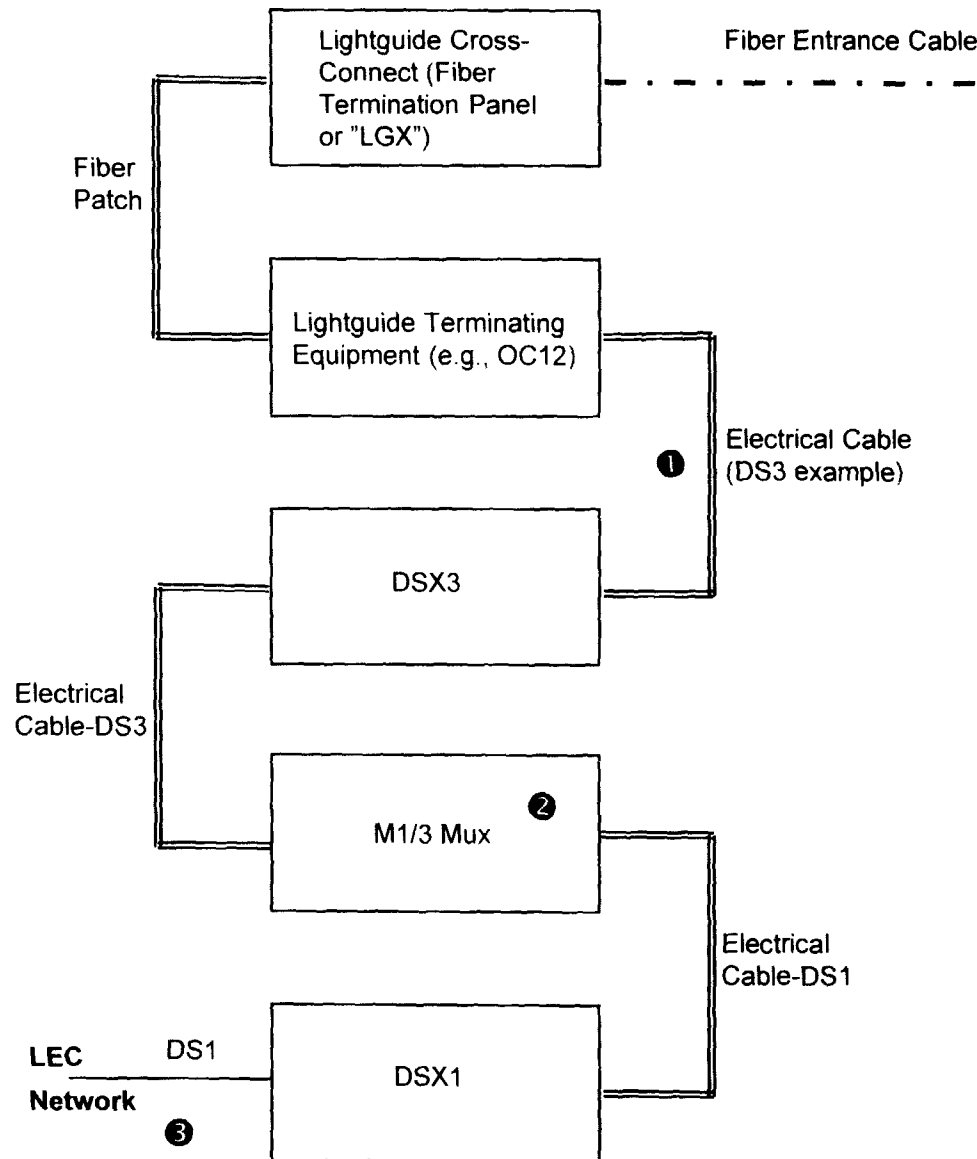
LEC CB/IDT (Integrated Digital Terminal) or CB/DCS (Dig. X-Connect System) ● : A non-traditional, rarely-used loop-provisioning arrangement.

LEC COT (Central Office Terminal) ● : A loop-provisioning arrangement selectively deployed by incumbent LECs in some areas.

LEC DCS ● **and Direct Incumbent-LEC DS1** ● : Two non-traditional high-capacity loop arrangements selectively deployed by incumbent LECs in some areas.

EXHIBIT B

Split Billing Issue



Key LEC Billing Elements:

- ① Cross Connect
- ② Multiplexing
- ③ Switched Access Elements or Special Access Transport and Channel Termination

